



State of Illinois
ENVIRONMENTAL PROTECTION AGENCY
MEMORANDUM

DATE: September 13, 2010

TO: Division Files - Bureau of Land

FROM: Chris Cahnovsky – Collinsville Region

SUBJECT: 1198010003 – Madison County
Estate of Chemetco
FOS File

On September 9, 2010, I met with Jorge Garcia with the Estate of Chemetco, Mike Murray and Gerald Barreara of AIS. The purpose of this inspection was to discuss the disposal options of the concrete portion of the cells in the Tank House.

On September 3, 2010, Jorge Garcia received the results of the concrete sample. The sample consisted of a composite sample of several areas of the concrete piles. The sample results showed that the concrete was non hazardous for lead and cadmium per a TCLP analysis.

AIS has completed the demolition of the cells within the Tank House. Almost all of the lead liners have been removed from the concrete portions of the cells. I showed Mr. Murray the areas I was concerned about. These areas are where the crumbled concrete from the cells have mixed with the debris that was on the floor of the Tank House. I explained that this material would likely be a hazardous waste and could not go to the landfill. He explained that he will remove this material and take it to the Fines Building. I requested that the material be removed prior to removing any non hazardous concrete from the Tanks House. This would prevent tracking the hazardous material onto the non hazardous concrete. He agreed to this request.

I later received a call from David Herrera of AIS. Mr. Herrera asked for clarification on the classification of the concrete. I explained that the concrete would be considered a pollution control waste and an industrial process waste thus meeting the definition of a special waste. In order to declassify the waste as a non special waste he must certify the waste as a non special waste pursuant to Section 22.48 of the Illinois Environmental Protection Act. I suggested that he permit the waste to the landfill. As part of the permitting process the landfill will have AIS or AID sign a non hazardous waste certification. It appeared that Mr. understood the requirements.

On this same day I received a call from Jorge Garcia. Mr. Garcia asked if it would be allowable for AID and the Estate to store the concrete from cells in the Fines Building for later reclamation in the AID treatment process. I expressed my concerns that the treatment process may not be able to treat concrete. Also that it had not been demonstrated that the concrete contained any recoverable metals. I expressed my concerns that the concrete may not have enough recoverable metals and storage of the concrete for future metal reclamation might be used as substitute for proper disposal. Mr. Garcia seemed to understand my concerns.

The small containers of hazardous waste that were collected from the clean out on the maintenance area of the Tank House have been moved back into the Tank House for lab packing. AIS expects to have this waste lab packed by the end of September.

cc: Regional Files
cc: Erin Rednour
cc: Michelle Kerr - USEPA